

State of Alabama

County of *Covington*

AFFIDAVIT

My name is Jacky Partridge and I reside in Paxton, Florida and receive mail at Post Office Box 84, Florala, Alabama.

I began working at the Lockhart Lumber facility when it was operated by Lockhart Lumber before it was transferred to TMA (PACTIV). The mill was purchased by Louisiana-Pacific Corporation (LP) in the mid nineteen eighties. I worked at the Lockhart Lumber mill continuously from March of 1976 until January of 1999. My titles and jobs included shipping clerk and forklift operator. I also did the plant lumber inventory, worked some in the treatment plant and also worked some at the boilers.

The boilers use fire from wood or wood bark to create heat and steam energy for use at the lumber mill and treatment facility. The steam is run through pipes to the lumber drying kiln to provide heat to dry lumber that is cut from green logs. There was also a steam pipe run to the treatment mill. One of my jobs, which would frequently entitle me to over-time pay, was to clean out the ashes left from boiler

operation. The ash cleaning operation would normally take place at night because it was cooler and the boiler would have time to cool off. We were working in hot ashes, in a hot boiler and wanted it to cool off as much as possible to make the work tolerable. We would clean out each boiler every week or so. I did not take part in cleaning the ashes out of boilers every time they were cleaned, but I normally helped perform this task. I was one of the last hourly employees left at the Louisiana Pacific mill and was employed there until early 1999. I do not remember cleaning out boilers much, if at all, in 1998, it would have been done by someone else, but this is a task I performed regularly for my entire term of employment at the lumber mill and wood treatment facility. I do, however, remember cleaning out the boilers until the end of 1997 or the beginning of 1998.

In order to clean out the boilers, one man would go inside a small metal door and shovel the ashes out. Another man would shovel the ashes away from in front of the door onto a concrete pad so that the doorway would remain clear in the event the man inside needed to get out quickly. The ashes would normally then be shoveled onto a pan that could be lifted by a forklift and carried away. The pan was approximately

eight feet (8') long and five feet (5') wide. It was approximately eighteen inches (18") deep. When we cleaned out a boiler we would scatter approximately one to two pans of boiler ash over the lumber mill yard. The lumberyard was approximately forty acres in area and I would carry the ashes to the southern section to scatter them. This process also left some ashes that scattered from shoveling on the concrete pads. I would wash these ashes off the pad with a water hose. They would either wash into a drainpipe or out onto the dirt in the yard area. The ashes that were shoveled into the pan were then taken to the back of the lumberyard and scattered over the ground. The ashes were always scattered on the lot and were never shipped away or disposed of in any other manner, except for those ashes that were disposed by washing them away with the hosepipe. Robert Goldsmith helped me do this. I know for a fact that all of the ashes from the facility's boilers were scattered on the facility's lot because that was the normal practice at the plant. I was involved in this practice on many occasions. These were my instructions and how I was taught to dispose of the boiler ash.

There were some drums of CCA (chromium, copper and arsenic compound), which were shipped out; otherwise there was no waste that was ever shipped from the facility that I recall.

We would occasionally put treated lumber through the finishing mill or planer. I remember this process being done on occasion with CCA treated lumber. The chips and planings from the CCA treated lumber that were put through the planing mill, together with end pieces where it was trimmed to size, were either burned in our boiler or sold to people to use as firewood. This process continued and never changed through 1997.

I drove the forklift, which was used to carry material into the wood pile at the burner to be burned. This material was burned at night "so the smoke wouldn't be so bad." Wood chips from treated lumber, end pieces, broken pieces, any other waste or scraps that were not sold as lumber, were burned in the facility boiler as long as I was an employee.

The amount of board feet of lumber produced by the Louisiana-Pacific facility on a daily basis would depend upon the nature of the lumber being produced. One by fours (1x4) required three linear feet in order to produce one board foot, where a two by twelve (2x12) would

only require six inches of linear foot for the same amount of board footage. On a bad day of producing 1x4s the mill would produce 50,000-60,000 board feet in a day. When we were producing 2x4s, our production may be about the same or a little better. When we produced 2x6s and 2x10s, our production would increase to as much as 180,000-200,000 board feet a day. This production was not all converted to treated lumber. We sold both white lumber (untreated) and different types of treated lumber throughout the years. My best judgment is that we averaged 10,000-18,000 board feet of treated lumber a day. We also made fence posts and poles that were treated with creosote, although LP didn't treat much with creosote. They primarily treated with CCA after they quit using penta (pentachlorophenol).

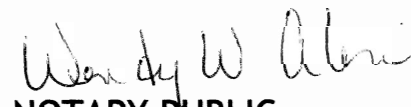
Our lumber facility also included a retail shed where we sold lumber, both treated and white lumber, as well as fence posts to the public on a retail basis. In fact, we were open on Saturdays until dinner for the purpose of selling retail. The retail sales were being conducted when I went to work at the mill in 1976, and, except for end cuts used for firewood, ceased soon after LP took over the mill. I would assist in loading lumber sold to retail customers, but I do not remember ever

loading any treated lumber that was sold as firewood. It may have been done, but I put all of the treated lumber scraps into the woodpile to be burned in the boilers.

The last of the stock of wood was gone from the mill, right down to the sticks used to separate drying lumber, when I left there in early 1999.


JACKY PARTRIDGE

Sworn to and subscribed before me this 10 day of April, 2006.


NOTARY PUBLIC

My Commission Expires: 9-13-08

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